

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF OKLAHOMA**

**In re:**

**POSTROCK ENERGY  
CORPORATION**

PostRock Energy Service Corporation  
PostRock MidContinent Production LLC  
PostRock Eastern Production, LLC  
PostRock Holdco, LLC  
STP Newco, Inc.

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**Case No: 16-11230-SAH**  
**(Chapter 11)**

Case No. 16-11231  
Case No. 16-11232  
Case No. 16-11233  
Case No. 16-11235  
Case No. 16-11236

§ Jointly Administered under No. 16-11230

**AGREED MOTION FOR ENTRY OF AN ORDER APPOINTING A CHAPTER 11  
TRUSTEE PURSUANT TO 11 U.S.C. § 1104(a)(2)**

## NOTICE OF OPPORTUNITY FOR HEARING

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THIS DOCUMENT CAREFULLY AND CONSULT YOUR ATTORNEY ABOUT YOUR RIGHTS AND THE EFFECT OF THIS DOCUMENT. CITIBANK AND THE DEBTORS HAVE REQUESTED AN EMERGENCY HEARING FOR THIS MOTION AND IF GRANTED, A HEARING WILL BE HELD AT THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF OKLAHOMA, 9<sup>TH</sup> FLOOR, OLD POST OFFICE BUILDING, 215 DEAN A. MCGEE AVENUE, OKLAHOMA CITY, OKLAHOMA, ON WEDNESDAY, APRIL 6, 2016, AT 1:30 P.M. THE DEADLINE FOR FILING OBJECTIONS TO THE MOTION WILL BE TUESDAY, APRIL 5, 2016, AT 12:00 NOON. IF YOU DO NOT WANT THE COURT TO GRANT THE REQUESTED RELIEF OR IF YOU WISH TO HAVE YOUR VIEWS CONSIDERED, YOU MUST FILE A WRITTEN RESPONSE OR OBJECTION SPECIFICALLY ANSWERING EACH PARAGRAPH OF THIS PLEADING. YOU MUST FILE YOUR RESPONSE WITH THE CLERK OF THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF OKLAHOMA, 215 DEAN A. MCGEE AVENUE, OKLAHOMA CITY, OKLAHOMA, 73102. IN ADDITION TO FILING YOUR RESPONSE WITH THE CLERK, YOU MUST SERVE A FILE-STAMPED COPY OF YOUR RESPONSE OR OBJECTION ON THE SIGNING ATTORNEY AND TO ANY OTHER PARTY SPECIFIED. IF NO RESPONSE OR OBJECTION**

IS TIMELY FILED, THE COURT MAY TREAT THE PLEADING AS UNOPPOSED AND GRANT THE RELIEF REQUESTED WITHOUT HEARING.

REPRESENTED PARTIES SHOULD ACT THROUGH THEIR ATTORNEYS.

Citibank, N.A. ("Citibank"), a secured creditor and party in interest herein, files this *Agreed Motion for Entry of an Order Appointing a Chapter 11 Trustee Pursuant to 11 U.S.C § 1104(a)(2)* (the "Motion") and, in support thereof, respectfully states the following:

1. On April 1, 2016 (the "Petition Date"), PostRock Energy Corporation ("PostRock Energy"), PostRock Energy Services Corporation ("Energy Services"), PostRock MidContinent Production, LLC ("PostRock MidContinent") PostRock Eastern Production, LLC ("PostRock Eastern"), PostRock Holdco, LLC ("PostRock Holdco"), and STP Newco, LLC ("STP Newco") (collectively the "Debtors") each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Code (the "Bankruptcy Code"), thereby initiating the above-styled and numbered cases (collectively, the "Cases").

2. The Debtors are primarily engaged in the business of natural gas production in southeastern Kansas and northeastern Oklahoma. The Debtors also own and operate oil and gas equipment, including cementing, fracture treatment, and servicing rigs. By this Motion, Citibank requests the immediate appointment of a chapter 11 trustee (a "Trustee") for the Debtors' estates and to operate the Debtors' businesses. The Debtors agree to entry of an order appointing a Trustee in these Cases.

3. This Court has jurisdiction over this Motion pursuant to 28 U.S.C. §§ 157(b)(2) and 1334(b). The relief sought in this Motion involves a core proceeding pursuant to 28 U.S.C. § 157(b)(2). Venue is proper in this Court pursuant to 28 U.S.C. § 1409(a) because this is a proceeding arising under, arising in, or related to a case under the Bankruptcy Code.

**Arguments and Authorities**

4. The appointment of a Chapter 11 Trustee in these Cases serves the best interest of creditors and other interests of the Debtors' estates. Accordingly, appointment of a Trustee in these cases is warranted pursuant to section 1104(a)(2) of the Bankruptcy Code. The Debtors consent to the appointment of a Trustee in these Cases. The United States Trustee for this District also agrees that the appointment of a Chapter 11 Trustee in these Cases is in the best interest of creditors.

5. This Court has previously ordered the appointment of a Chapter 11 Trustee based on the agreement of the parties. *See Macco Props., Inc. v. Deebea (In re Macco Props.)*, No. 10-16682-NLJ, No. 11-1099, 2011 Bankr. LEXIS 5755, \*22 ( Bankr. W.D. Okla. September 7, 2011). Accordingly, based on all of the foregoing, there is good cause for the Court to order the appointment of a Trustee in these Cases.

**WHEREFORE, PREMISES CONSIDERED**, Citibank respectfully requests that the Court: (i) grant the Motion; (ii) appoint a Trustee to take possession of the bankruptcy estates and property of the Debtors, to operate the Debtors' businesses, and to perform the duties of a trustee prescribed by section 1106(a) of the Bankruptcy Code; and (iii) grant Citibank such other and further relief to which it may show itself to be justly entitled.

**DATED: April 1, 2016**

/s/ Steven W. Bugg

Steven W. Bugg - OBA#1299

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**ATTORNEYS FOR CITIBANK, N.A., AS  
ADMINISTRATIVE AGENT AND  
COLLATERAL AGENT**

**CERTIFICATE OF SERVICE**

The undersigned certifies that on April 1, 2016, a true and accurate copy of this document will be electronically mailed to the parties that are registered or otherwise entitled to receive electronic notices in this proceeding pursuant to the Electronic Filing Procedures in this District.

/s/ Steven W. Bugg

One of Counsel